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October 29, 2024

## **VIA ECF**

Hon. Jesse M. Furman United States District Court Southern District of New York 40 Centre Street, Room 2202 New York, NY 10007

Re: Arianit Simoni v. The First Rate Group LLC, First Rate Maintenance LLC, and Quality Concierge Services Inc., Case No. 1:24-cv-05784

Dear Judge Furman,

My firm represents defendants The First Rate Group LLC and First Rate Maintenance LLC in the above-referenced action.

A settlement conference in this matter was scheduled for today, October 29, 2024, before Magistrate Judge Robert W. Lehrburger, which has now been postponed to a date to be determined. An initial conference is currently scheduled before Your Honor for November 6, 2024 at 9 am.

Counsel for defendant Quality Concierge Services, Inc. ("QCS") did not appear in this action until October 15, 2024. That same day, counsel for QCS filed a letter motion requesting an extension of time for QCS to respond to the Complaint to November 11, 2024, which Your Honor granted. On October 25, 2024, counsel for QCS requested postponement of the scheduled settlement conference, which Magistrate Lehrburger granted on October 28, 2024, stating:

The settlement conference will be rescheduled; however, the new date likely will be after November 6. Judge Lehrburger's Deputy Clerk will coordinate a new date for the settlement conference with the parties. The parties shall meet and confer as to how they wish to proceed with respect to the conference date with Judge Furman and direct any request directly to him.



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Counsel for all parties have conferred, and we respectfully request that the initial conference be postponed until after the settlement conference. This is the first request for a postponement of this conference.

Thank you for your consideration.

Respectfully,

/S/ Gregg Brochin

Abdul Hassan, counsel for Plaintiff (by ECF) cc: Stuart Weinberger, counsel for QCS (by ECF)

Application GRANTED. The initial pretrial conference is hereby ADJOURNED to November 20, 2024, at 9:00 a.m. The Clerk of Court is directed to terminate ECF No. 24.